

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:14-CR-00128-2H

UNITED STATES OF AMERICA :  
 :  
 v. : **MOTION FOR ISSUANCE OF**  
 : **ORDER OF FORFEITURE**  
 :  
 WILLIAM TODD CHAMBERLAIN :

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, requests that the Court issue an order of forfeiture in the above criminal action pursuant to Fed. R. Crim. P. 32.2. In support of this motion, the Government shows unto the Court the following:

1. On January 13, 2020, the defendant was charged in a two-count Superseding Criminal Information with conspiracy to willingly and knowingly embezzle and steal property of the United States in violation of 18 U.S.C. § 371, and receipt of stolen property in violation of 18 U.S.C. §§ 641 and 2.

2. On January 13, 2020, the defendant entered into a Plea Agreement as to Counts One and Two of the Superseding Criminal Information; specifically, to offenses in violation of 18 U.S.C. § 371, and 18 U.S.C. §§ 641 and 2, and agreed to forfeit certain property, to wit: \$40,000.00, which represents proceeds that the defendant personally obtained directly or indirectly as a result of the said offenses,

and for which the United States may forfeit substitute assets pursuant to 21 U.S.C. § 853(p).

3. The Court's jurisdiction in this matter is founded upon 18 U.S.C. § 981(a)(1)(C), as made applicable by 18 U.S.C. § 2461(c), which provides for the forfeiture of property constituting or derived from proceeds traceable to an offense constituting specified unlawful activity or a conspiracy to commit such offense.

4. Pursuant to the Plea Agreement, and the defendant's guilty plea to offenses in violation of 18 U.S.C. § 371, and 18 U.S.C. §§ 641 and 2, the government requests that the Court enter an order forfeiting the amount of \$40,000.00 as representing the gross proceeds of the offenses personally obtained by the defendant, while retaining jurisdiction over this matter for the purpose of amending the Order of Forfeiture to include any subsequently located substitute assets pursuant to 21 U.S.C. § 853(p).

WHEREFORE, based on the foregoing, the Court is requested to order, pursuant to 18 U.S.C. § 981(a)(1)(C), that the proceeds of the criminal violation, \$40,000.00, be forfeited to the United States, and to retain jurisdiction over this matter for the purpose of amending the Order of Forfeiture to include any subsequently located substitute assets.

*[Remainder of Page Left Intentionally Blank]*

Respectfully submitted this 24th day of March, 2020.

ROBERT J. HIGDON, JR.  
United States Attorney

BY: /s/ John E. Harris  
JOHN E. HARRIS  
Assistant United States Attorney  
Attorney for Plaintiff  
Civil Division  
150 Fayetteville Street, Suite 2100  
Raleigh, NC 27601  
Telephone: (919) 856-4530  
Facsimile: (919) 856-4821  
E-mail: [John.Harris5@usdoj.gov](mailto:John.Harris5@usdoj.gov)  
NC State Bar No. 49253

CERTIFICATE OF SERVICE

I certify that I have on this 24th day of March, 2020, served a copy of the foregoing Motion for Issuance of Order of Forfeiture upon counsel electronically via ECF:

Thomas Courtland Manning  
Email: [thomasmanning@manninglaw.com](mailto:thomasmanning@manninglaw.com)

Elliot Sol Abrams  
Email: [elliott.abrams@cheshirepark.com](mailto:elliott.abrams@cheshirepark.com)

ROBERT J. HIGDON, JR.  
United States Attorney

BY: /s/ John E. Harris  
JOHN E. HARRIS  
Assistant United States Attorney  
Attorney for Plaintiff  
Civil Division  
150 Fayetteville Street, Suite 2100  
Raleigh, NC 27601  
Telephone: (919) 856-4530  
Facsimile: (919) 856-4821  
E-mail: [John.Harris5@usdoj.gov](mailto:John.Harris5@usdoj.gov)  
NC State Bar No. 49253